

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

RESIDENTIAL CAPITAL, LLC, et al.,

Debtors.

:
:
: Chapter 11

: Case No. 12-12020 (MG)

:
: Jointly Administered

RESIDENTIAL CAPITAL, LLC, et al.,

Plaintiffs,

v.

UMB BANK, N.A., IN ITS CAPACITY AS
INDENTURE TRUSTEE FOR THE 9.625%
JUNIOR SECURED GUARANTEED
NOTES, et al.,

Defendants.

:
:
:
: Adv. Proc. No. 13-01343 (MG)

OFFICIAL COMMITTEE OF UNSECURED
CREDITORS, on behalf of the estate of the
Debtors,

Plaintiffs,

v.

UMB BANK, N.A., AS SUCCESSOR
INDENTURE TRUSTEE UNDER THAT
CERTAIN INDENTURE, dated as of June 6,
2008, et al.,

Defendants.

:
:
:
: Adv. Proc. No. 13-01277 (MG)

SECOND CONSOLIDATED DEPOSITION DESIGNATIONS

TO THE HONORABLE MARTIN GLENN,
UNITED STATES BANKRUPTCY JUDGE:

The above-captioned debtors and debtors in possession (collectively, the “Debtors”), the Official Committee of Unsecured Creditors (the “Committee”), UMB Bank, N.A. (“UMB”), in its capacity as indenture trustee for the 9.625% Junior Secured Guaranteed Notes due 2015 issued by Debtor Residential Capital, LLC (the “Junior Secured Notes”), Wells Fargo Bank, N.A. (“Wells Fargo”), and the Ad Hoc Group of holders of Junior Secured Notes (the “Ad Hoc Group” or “JSNs” and, with UMB and Wells Fargo, the “Defendants”), hereby submit the following designations of deposition testimony, objections, and counter-designations in connection with the above-captioned adversary proceedings and in connection with the Court’s hearing to confirm the Joint Chapter 11 Plan Proposed by Residential Capital, LLC, et al. and the Committee.

In addition to the following objections, the Parties reserve the right to object to any attempted use of deposition transcripts, or any portion thereof, to the extent such use falls beyond the allowances of Rule 32 of the Federal Rule of Civil Procedure, as incorporated by Bankruptcy Rule 7032. The Parties further reserve the right to serve errata in accordance with Rule 30(e) of the Federal Rules of Civil Procedure, as incorporated by Bankruptcy Rule 7030, such that the errata will included as part of the designations or counter-designations.

The Debtors, the Committee, and the Defendants will continue to meet and confer to resolve outstanding objections and will advise the Court of their progress, if any, as soon as practicable.

JAMES ARETAKIS November 6, 2013 Deposition Transcript			
UMB and Ad Hoc Group Designations	Debtors' and Committees' Objections	Debtors' and Committees' Counter- Designations	UMB and Ad Hoc Group Objections to Counter- Designations
9:06 – 19			
15:18 – 19	Irrelevant (FRE 401, 402), inadmissible hearsay (FRE 802)		
16:06 – 017:15	Irrelevant (FRE 401, 402), inadmissible hearsay (FRE 802)	18:5-19:17	
20:17 – 022:13	Irrelevant (FRE 401, 402) 22:7-13: Lack of personal knowledge (FRE 602), inadmissible hearsay (FRE 802)	22:15-19	
22:20 – 023:05	Lack of personal knowledge (FRE 602), inadmissible hearsay (FRE 802) 23:4-5: Inadmissible hearsay and double hearsay (FRE 802), irrelevant (FRE 401, 402), unduly prejudicial (FRE 403), lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), incomplete (FRE 106)	22:15-19	
24:13 – 14	Inadmissible hearsay (FRE 802), irrelevant (FRE 401, 402), lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903)		

JAMES ARETAKIS November 6, 2013 Deposition Transcript			
UMB and Ad Hoc Group Designations	Debtors' and Committees' Objections	Debtors' and Committees' Counter- Designations	UMB and Ad Hoc Group Objections to Counter- Designations
24:17 – 025:04	Inadmissible hearsay (FRE 802), irrelevant (FRE 401, 402), unduly prejudicial (FRE 403), lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), incomplete (FRE 106)	25:11-21 26:3-8 28:16-29:7 32:2-11 66:10-67:13 69:3-17	Irrelevant (FRE 401, 402)
32:25 – 033:18	Irrelevant (FRE 401, 402), inadmissible hearsay (FRE 802)	35:9-15 37:20-38:7	
38:25 – 039:20	Irrelevant (FRE 401, 402) , inadmissible hearsay (FRE 802)	39:21-40:6	
41:08 – 17	Irrelevant (FRE 401, 402), incomplete (FRE 106) , inadmissible hearsay (FRE 802)	42:2-13	
42:21 – 043:18	Irrelevant (FRE 401, 402), inadmissible hearsay (FRE 802)	43:19-44:10	
45:13 - 16		45:16-46:6	
46:10 – 15	Inadmissible hearsay (FRE 802), irrelevant (FRE 401, 402), unduly prejudicial (FRE 403), lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), incomplete (FRE 106)	46:16-19	

JAMES ARETAKIS November 6, 2013 Deposition Transcript			
UMB and Ad Hoc Group Designations	Debtors' and Committees' Objections	Debtors' and Committees' Counter- Designations	UMB and Ad Hoc Group Objections to Counter- Designations
46:24 – 048:12	Inadmissible hearsay (FRE 802), irrelevant (FRE 401, 402), lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), incomplete (FRE 106)	48:12-49:10	
51:10 – 18		51:20-52:16	
53:13 – 20	Inadmissible hearsay (FRE 802), irrelevant (FRE 401, 402), lack of personal knowledge (FRE 602), impermissible lay opinion	53:22-54:4	
54:12 – 055:18	Inadmissible hearsay (FRE 802), irrelevant (FRE 401, 402), lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), impermissible lay opinion		
58:13 – 059:06	Inadmissible hearsay (FRE 802), irrelevant (FRE 401, 402), lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903)		
59:18 – 060:02	Inadmissible hearsay (FRE 802), irrelevant (FRE 401, 402), lack of personal knowledge (FRE 602)	60:9-13	

JAMES ARETAKIS November 6, 2013 Deposition Transcript			
UMB and Ad Hoc Group Designations	Debtors' and Committees' Objections	Debtors' and Committees' Counter-Designations	UMB and Ad Hoc Group Objections to Counter-Designations
60:17 – 063:12	Inadmissible hearsay (FRE 802), irrelevant (FRE 401, 402), lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), impermissible lay opinion		
70:03 – 071:20	Inadmissible hearsay (FRE 802), irrelevant (FRE 401, 402), lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), impermissible lay opinion	71:21-72:6	
74:06 – 077:08	Inadmissible hearsay (FRE 802), irrelevant (FRE 401, 402), lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), impermissible lay opinion		

JAMES ARETAKIS November 6, 2013 Deposition Transcript			
Debtors' and Committees' Designations	UMB and Ad Hoc Group Objections	UMB and Ad Hoc Group Counter-Designations	Debtors' and Committees' Objections to Counter Designations
5:21-23			
45:13-46:6		12:10-14:21	Beyond the scope of affirmative designation; irrelevant (FRE 401, 402).

JAMES ARETAKIS November 6, 2013 Deposition Transcript			
Debtors' and Committees' Designations	UMB and Ad Hoc Group Objections	UMB and Ad Hoc Group Counter-Designations	Debtors' and Committees' Objections to Counter Designations
77:17-80:16			

CONOR BASTABLE November 1, 2013 Deposition Transcript		
Debtors' and Committees' Designations	UMB and Ad Hoc Group Objections	UMB and Ad Hoc Group Counter-Designations
6:8-23		11:25 – 12:24
21:6 – 23:13	FRE 402 (Not relevant)	
25:13 – 27:25		31:15 – 32:7
49:3 – 20	FRE 402 (Not relevant)	
60:23 – 62:10	61:14-18: FRE 611(a) (Compound)	158:4 – 162:21
62:18 – 64:21	64:2-12: FRE 611(a) (Vague and ambiguous) 64:13-21: FRE 611(a) (Compound)	64:22-65:7 90:12 – 91:10 154:2 – 155:6

CONOR BASTABLE November 1, 2013 Deposition Transcript		
Debtors' and Committees' Designations	UMB and Ad Hoc Group Objections	UMB and Ad Hoc Group Counter-Designations
67:16 – 68:4		66:4 – 67:15 68:5-6 68:18 – 69:24
68:7 – 17		
69:25 – 70:21		
130:17 – 132:13	130:20-24: FRE 1002 (Best evidence) 131:19-22: FRE 611(a) (Compound)	
132:20 – 133:6	132:23 – 133:6: FRE 611(a) (Vague and ambiguous) 132:20 – 133:6: FRE 602 (Lacks personal knowledge, calls for speculation)	129:6 – 130:11
133:21 – 134:7	FRE 402 (Not relevant)	134:8-9
134:10 – 135:15	FRE 402 (Not relevant) FRE 602, 701, 702 (Lacks foundation, calls for expert opinion)	

CONOR BASTABLE November 1, 2013 Deposition Transcript		
Debtors' and Committees' Designations	UMB and Ad Hoc Group Objections	UMB and Ad Hoc Group Counter-Designations
135:22 – 136:6	FRE 402 (Not relevant) FRE 602, 701, 702 (Lacks foundation, calls for expert opinion)	136:7
136:8 – 136:25	FRE 402 (Not relevant) FRE 602, 701, 702 (Lacks foundation, calls for expert opinion)	
143:25 – 148:13	FRE 802 (Hearsay) FRE 1002 (Best evidence) 146:11-17 & 147:3-6: FRE 611(a) (Compound)	141:13 – 143:24

MICHAEL CARPENTER November 12, 2013 Deposition Transcript			
UMB and Ad Hoc Group Designations	Debtors' and Committees' Objections	Debtors' and Committees' Counter-Designations	UMB and Ad Hoc Group Objections to Counter-Designations
16:9-17:17			
19:20-21:18	Irrelevant (FRE 401, 402) <u>19:20-21:7</u> Inadmissible hearsay (FRE 802)	18:10-19:7	
23:10-24:20			

MICHAEL CARPENTER November 12, 2013 Deposition Transcript			
UMB and Ad Hoc Group Designations	Debtors' and Committees' Objections	Debtors' and Committees' Counter-Designations	UMB and Ad Hoc Group Objections to Counter-Designations
25:7-16			
26:24-27:5			
29:25-30:8			
33:14-22	Inadmissible hearsay (FRE 802)		
36:3-37:12	Inadmissible hearsay (FRE 802)	37:13-14	
37:15-21	Inadmissible hearsay (FRE 802)		
41:4-42:23		39:15-40:21	
43:5-15			
46:6-23		45:16-46:5	Irrelevant (FRE 401, 402), lack of foundation (FRE 602, 901, 903)
48:19-22		48:23-24	
48:25-49:18	Irrelevant (FRE 401, 402), lack of personal knowledge (FRE 602) <u>49:15-18</u> Objection to form: vague and ambiguous	49:19-50:4	Irrelevant (FRE 401, 402), Inadmissible hearsay (FRE 802)
50:20-51:10	Irrelevant (FRE 401, 402)		
60:3-11			

MICHAEL CARPENTER November 12, 2013 Deposition Transcript			
UMB and Ad Hoc Group Designations	Debtors' and Committees' Objections	Debtors' and Committees' Counter-Designations	UMB and Ad Hoc Group Objections to Counter-Designations
61:4-62:5	Lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), inadmissible lay opinion		
63:19-21			
64:2-6			
64:8-13			
66:5-68:16	<u>67:9-22; 68:6-16</u> Lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), inadmissible lay opinion		
69:3-19	Lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), inadmissible lay opinion		
70:20-25	Irrelevant (FRE 401, 402), lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), inadmissible lay opinion	71:2-4	

MICHAEL CARPENTER November 12, 2013 Deposition Transcript			
UMB and Ad Hoc Group Designations	Debtors' and Committees' Objections	Debtors' and Committees' Counter-Designations	UMB and Ad Hoc Group Objections to Counter-Designations
71:5-7	Irrelevant (FRE 401, 402), lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), inadmissible lay opinion	71:2-4	
81:5-11			
82:14-83:5	Lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), inadmissible lay opinion		
84:14-85:21			
86:3-6		86:7-87:7	Inadmissible hearsay (FRE 802)
87:8-13		87:14-16	

AL CELINI November 8, 2013 Deposition Transcript			
UMB and Ad Hoc Group Designations	Debtors' and Committees' Objections	Debtors' and Committees' Counter-Designations	UMB and Ad Hoc Group Objections to Counter-Designations
14:20-15:7		15:8-14	
16:2-18:7		15:15-25	
18:11-19:18	Irrelevant (FRE 401, 402)		

AL CELINI November 8, 2013 Deposition Transcript			
UMB and Ad Hoc Group Designations	Debtors' and Committees' Objections	Debtors' and Committees' Counter-Designations	UMB and Ad Hoc Group Objections to Counter-Designations
19:23-20:8	22:17-23:15: Irrelevant (FRE 401, 402)		
20:17-21:16			
22:17-24:15			
25:18-26:24	26:12-24: Irrelevant (FRE 401, 402)		
27:14-28:9	Irrelevant (FRE 401, 402)	28:10-29:11	FRE 611(a) (Non-responsive)
31:13-20		31:21-32:5	
32:6-23	Irrelevant (FRE 401, 402)	35:9-36:12	
36:23-38:25			
42:10-13		41:23-42:9; 42:14-42:24; 43:13-44:6	
51:6-54:20		54:21-56:12; 74:22-75:17	
73:10-74:4	Lack of foundation (FRE 602, 901), lack of personal knowledge/speculative (FRE 602)	74:5-75:17	
90:19-91:12			
92:23-93:25			
95:22-96:10		105:8-106:16	
104:9-25	Lack of personal knowledge/speculative (FRE 602); calls for legal conclusion	96:11-98:11	
117:21-118:12		118:21-119:18	
121:25-122:7		121:6-24	
122:22-123:25	Irrelevant (FRE 401, 402)		

AL CELINI November 8, 2013 Deposition Transcript			
UMB and Ad Hoc Group Designations	Debtors' and Committees' Objections	Debtors' and Committees' Counter-Designations	UMB and Ad Hoc Group Objections to Counter-Designations
127:2-16			
130:18-133:23	Lack of personal knowledge/speculative (FRE 602)	133:24-134:13	
134:14-19	Lack of personal knowledge/speculative (FRE 602); calls for legal conclusion		
148:3-149:3		145:20-146:5; 146:11-23	
150:20-151:5			
152:20-25			

AL CELINI November 8, 2013 Deposition Transcript		
Debtors' and Committees' Designations	UMB and Ad Hoc Group Objections	UMB and Ad Hoc Group Counter-Designations
41:5-22		
42:25-43:8		43:9-12
43:13-21		43:9-12
47:4-8		
71:16-72:8	FRE 611(a) (Non-responsive)	70:19-71:10 72:9-23
91:20-92:17		92:18-22
97:2-22	97:17-22: FRE 611(a) (Non-responsive)	
98:20-99:2		99:3-18
100:18-25		

AL CELINI November 8, 2013 Deposition Transcript		
Debtors' and Committees' Designations	UMB and Ad Hoc Group Objections	UMB and Ad Hoc Group Counter-Designations
149:14-151:21		
152:4-155:23	154:14-18: FRE 611(c) (Leading)	
156:6-159:10		
159:21-160:10	159:21-25: FRE 602, 802 (Lacks personal knowledge; calls for hearsay) 160:2-10 FRE 611(c) (Leading)	160:11-15

JOE CORTESE October 30, 2013 Deposition Transcript			
UMB and Ad Hoc Group's Designations	Debtors' and Committees' Objections	Debtors' and Committees' Counter-Designations	UMB and Ad Hoc Group's Objections to Counter-Designations
010:24 – 011:08			
012:24 – 013:14			
018:23 – 019:14			
026:07 – 13	Irrelevant (FRE 401, 402)	26:14 - 17	
033:22 – 036:04	Irrelevant (FRE 401, 402)	36:05 - 37:02 (in the event 33:22 – 36:04 is admitted over Plan Proponents' objection)	
037:03 – 039:06	Irrelevant (FRE 401, 402)		
048:13 – 20	Lack of personal knowledge (FRE 602)		

JOE CORTESE October 30, 2013 Deposition Transcript			
UMB and Ad Hoc Group's Designations	Debtors' and Committees' Objections	Debtors' and Committees' Counter-Designations	UMB and Ad Hoc Group's Objections to Counter-Designations
050:18-051:13			
051:14 – 053:16	Lack of personal knowledge (FRE 602); irrelevant (FRE 401, 402); calls for legal conclusion	53:17 - 53:22	
056:2 – 056:23	Lack of personal knowledge/speculative (FRE 602); irrelevant (FRE 401, 402)		
064:24 – 065:9			
065:25 – 066:22	Impermissible lay opinion (FRE 701, 702)		
066:23 – 068:18	Calls for legal conclusion; impermissible lay opinion (FRE 701, 702)		
068:19 – 071:15	Calls for legal conclusion; impermissible lay opinion (FRE 701, 702)	71:16 - 21	
071:22 – 072:03			
072:4 – 073:19		73:20 - 73:25	
075:11 – 077:20		74:10 - 75:10	
077:21 – 078:6			
078:07 – 079:21			
082:04 – 20		81:6 - 82:03	
083:17 – 84:22	Irrelevant (FRE 401, 402)		
097:02 – 098:11		95:14 - 96:25; 98:12 - 99:05	

JOE CORTESE October 30, 2013 Deposition Transcript			
UMB and Ad Hoc Group's Designations	Debtors' and Committees' Objections	Debtors' and Committees' Counter-Designations	UMB and Ad Hoc Group's Objections to Counter-Designations
099:06 – 100:09	Lack of personal knowledge (FRE 602)	100:10 - 22; 100:24 - 101:10 (in the event 99:06 – 100:09 is admitted over Plan Proponents' objection)	
103:14 – 104:20			
105:20 – 105:25			
106:07 – 110:17	Lack of personal knowledge (FRE 602); impermissible lay opinion (FRE 701, 702)		
110:25 – 111:25			
113:21 – 115:05			
119:14 – 121:08			
125:02 – 126:17		121:17 - 122:09; 122:11 - 124:25	
127:15 – 128:09			
130:10 – 131:12			
133:05 – 08			
133:09 – 134:20			
136:02 – 137:02			
137:03 – 139:08			
139:9 - 140:15			
140:16 – 22			
142:17 – 143:06		143:7 – 143:16	
144:07 – 146:09			

JOE CORTESE October 30, 2013 Deposition Transcript			
UMB and Ad Hoc Group's Designations	Debtors' and Committees' Objections	Debtors' and Committees' Counter-Designations	UMB and Ad Hoc Group's Objections to Counter-Designations
149:18 – 150:06			
150:7 – 150:16			
151:02 – 07			
152:09 – 25		153:2 - 10; 153:12 - 14	
153:15 – 154:03			
155:19 – 156:06		161:7 - 162:6; 162:8-20; 162:22 - 163:10; 164:2	
157:06 – 09			
171:05 – 16			
171:21 – 174:03		171:17 - 20	
176:19 – 177:02	Irrelevant (FRE 401, 402)		
177:03 – 178:15	Irrelevant (FRE 401, 402)		
183:24 – 185:07			
185:08 – 186:05		186:6 - 7; 186:9 - 25	
189:05 – 191:04		187:2- 4; 187:6 - 7; 187:9 - 188:10; 188:12 - 189:4; 191:5 - 192:11; 192:13 - 19; 193:6 - 16; 193:18 - 23	
196:12 – 197:06			
197:07 – 203:10			
203:21 – 210:06		210:18 - 20; 210:23 - 211:2	
212:03 – 25		213:2 - 8; 213:10 - 23	

JOE CORTESE October 30, 2013 Deposition Transcript			
UMB and Ad Hoc Group's Designations	Debtors' and Committees' Objections	Debtors' and Committees' Counter-Designations	UMB and Ad Hoc Group's Objections to Counter-Designations
216:10 – 217:04	Calls for speculation (FRE 602); calls for legal conclusion		
228:07 – 231:18		217:19 - 227:25	

CATHY DONDZILA October 17, 2013 Deposition Transcript			
UMB and Ad Hoc Group Designations	Debtors' and Committees' Objections	Debtors' and Committees' Counter-Designations	UMB and Ad Hoc Group Objections to Counter-Designations
013:11-14:16			
111:14-112:18			
115:15-22			
117:25-118:18			
119:2-11			
125:3-13			
129:19-130:16			
134:4-16			
135:14-136:24			
14:25-15:4			
15:7-15			
152:25-153:9			
18:23-22:3		22:4-15	
18:8-10			
22:16-23:20			
24:18-25:17			

CATHY DONDZILA October 17, 2013 Deposition Transcript			
UMB and Ad Hoc Group Designations	Debtors' and Committees' Objections	Debtors' and Committees' Counter- Designations	UMB and Ad Hoc Group Objections to Counter- Designations
24:3-8			
26:10-14			
30:13-33:21			
35:10-36:2			
36:17-37:22			
41:23-43:25			
46:16-47:20		47:21-48:08	
49:13-51:16			
54:18-57:10		57:11-16 57:23-58:04 58:12-19	
61:19-62:21			
65:15-67:16			
68:11-70:5			
70:17-71:4			
71:23-74:7			
79:6-80-21			
81:4-19			
84:13-86:6			
86:17-89:10			
91:5-9			
94:4-97:8			
97:22-98:25			
99:17-100:4			
111:14-112:18			
115:15-22			

CATHY DONDZILA October 17, 2013 Deposition Transcript			
UMB and Ad Hoc Group Designations	Debtors' and Committees' Objections	Debtors' and Committees' Counter-Designations	UMB and Ad Hoc Group Objections to Counter-Designations
117:25-118:18	Objection to form; vague and ambiguous		
119:2-11			
125:3-13			
129:19-130:16			
134:4-16			
135:14-136:24			
152:25-153:9			

CATHY DONDZILA October 17, 2013 Deposition Transcript			
Debtors' and Committees' Designations	UMB and Ad Hoc Group Objections	UMB and Ad Hoc Group Counter-Designations	Debtors' and Committees' Objections to Counter-Designations
8:11-9:22			
11:7-9		11:10-16	
11:20-14:16			
18:23-20:22			
26:2-14			
32:12-33:17			
35:5-36:2			
36:17-37:22			
43:14-44:21			
53:16-24		53:12-15 53:25-54:15	

CATHY DONDZILA October 17, 2013 Deposition Transcript			
Debtors' and Committees' Designations	UMB and Ad Hoc Group Objections	UMB and Ad Hoc Group Counter-Designations	Debtors' and Committees' Objections to Counter-Designations
58:25-59:20			
60:17-24			
61:19-62:3			
70:17-72:20			
77:22-78:6			
81:4-85:10			
92:11-94:3			
94:19-97:4		97:9-21	
100:5-101:8		101:9-17	
106:7-107:16		107:17-21	
111:14-112:4			
113:3-10		112:23-113:2	
125:3-13		125:14-19	
125:20-126:4		126:5-11	
134:4-16		133:3-134:3 140:5-7	Beyond the scope of affirmative testimony (133:3-134:3)
144:17-148:24			
149:17-24		149:9-16	
150:17-156:19		149:25-150:16 156:20-157:13	
157:18-25			
158:5-13		158:2-4 158:14-16	
158:17-159:11		159:12-15	

CATHY DONDZILA October 17, 2013 Deposition Transcript			
Debtors' and Committees' Designations	UMB and Ad Hoc Group Objections	UMB and Ad Hoc Group Counter-Designations	Debtors' and Committees' Objections to Counter-Designations
159:16-160:14		160:15-161:15	
161:16-162:23			
163:21-164:19		162:24-163:20 164:20-22	
164:23-25			
165:9-23		165:2-8	
166:23-167:23			
168:5-175:17			
176:4-19		176:20-177:6	
177:7-23		177:24-178:5	
178:6-16			
179:2-17		179:18-25	
180:2-182:8			
183:10-22		183:23-184:16	
184:17-185:4		185:5-187:16	Beyond the scope of affirmative testimony
187:17-191:4		191:9-21 192:2-193:4	

TERESA RAE FARLEY September 18, 2013 Deposition Transcript		
Wells Fargo's Designations	Debtors' and Committee's Objections	Debtors' and Committee's Objections Counter-Designations
191:7-214:14		

221:21-225:8		
229:11-23		

ADAM GLASSER November 13, 2013 Deposition Transcript			
UMB and Ad Hoc Group Designations	Debtors' and Committee's Objections	Debtors' and Committee's Counter-Designations	UMB and Ad Hoc Group Objections to Counter-Designations
11:8 – 18	Irrelevant (FRE 401, 402)		
12:9 – 19	Irrelevant (FRE 401, 402)	87:11-88:6	
14:8 – 17:12	Irrelevant (FRE 401, 402)		
17:13 – 19:23			
20:22 – 21:12		21:15-22:9	
22:11 – 14		22:15-23:10	Irrelevant (FRE 401, 402)
26:07 – 27:07			
28:08 – 29:06			
29:10 – 31:24	<u>29:22-31:24</u> Irrelevant (FRE 401, 402)		
31:25 – 32:13			
32:14 – 21		32:22-33:21	Irrelevant (FRE 401, 402)
34:16 – 24			
36:05 – 42:12	<u>41:6-42:12</u> Lack of personal knowledge/speculative (FRE 602), lack of foundation (FRE 602, 901)	34:25-36:3	Irrelevant (FRE 401, 402); incomplete question and answer
45:05 – 46:03			
46:06 – 13			

ADAM GLASSER November 13, 2013 Deposition Transcript			
UMB and Ad Hoc Group Designations	Debtors' and Committee's Objections	Debtors' and Committee's Counter-Designations	UMB and Ad Hoc Group Objections to Counter-Designations
47:04 – 48:18		46:6-47:3; 48:19-49:2	
49:03 – 50:02			
50:22 – 60:02	<u>50:22-15</u> Objection to form: vague, ambiguous <u>52:14-24; 53:5-18</u> Lack of personal knowledge/speculative (FRE 602), lack of foundation (FRE 602, 901); impermissible lay opinion <u>55:7-15; 55:24-56:7; 56:9-16</u> Lack of personal knowledge/speculative (FRE 602), lack of foundation (FRE 602, 901)	60:3-5	
60:06 – 67:06	<u>65:25-66:15</u> Lack of personal knowledge/speculative (FRE 602), lack of foundation (FRE 602, 901); impermissible lay opinion	67:7-21	

ADAM GLASSER November 13, 2013 Deposition Transcript			
UMB and Ad Hoc Group Designations	Debtors' and Committee's Objections	Debtors' and Committee's Counter-Designations	UMB and Ad Hoc Group Objections to Counter-Designations
69:03 – 76:18	<u>71:19-72:13</u> Irrelevant (FRE 401, 402), lack of personal knowledge/speculative (FRE 602), lack of foundation (FRE 602, 901) <u>72:15-73:6</u> Lack of personal knowledge/speculative (FRE 602), lack of foundation (FRE 602, 901); impermissible lay opinion	100:17-103:9	

ADAM GLASSER November 13, 2013 Deposition Transcript			
UMB and Ad Hoc Group Designations	Debtors' and Committee's Objections	Debtors' and Committee's Counter-Designations	UMB and Ad Hoc Group Objections to Counter-Designations
76:22 – 83:21	<u>77:15-78:17</u> Lack of personal knowledge/speculative (FRE 602), lack of foundation (FRE 602, 901); impermissible lay opinion <u>78:19-23</u> Lack of personal knowledge/speculative (FRE 602), lack of foundation (FRE 602, 901) <u>79:2-7; 79:16-80:9; 80:16-20; 80:25-81:3</u> Lack of personal knowledge/speculative (FRE 602), lack of foundation (FRE 602, 901) <u>81:4-16; 81:25-82:7</u> Lack of personal knowledge/speculative (FRE 602), lack of foundation (FRE 602, 901); impermissible lay opinion <u>82:20-83:21</u> Lack of personal knowledge/speculative (FRE 602), lack of foundation (FRE 602, 901); impermissible lay opinion		
84:21 – 86:15			

ADAM GLASSER November 13, 2013 Deposition Transcript			
UMB and Ad Hoc Group Designations	Debtors' and Committee's Objections	Debtors' and Committee's Counter-Designations	UMB and Ad Hoc Group Objections to Counter-Designations
87:21 – 88:03		87:11-20; 88:4-6	
88:11 – 89:05			
92:04 – 93:25		89:6-17; 91:8-92:3	
94:07 – 23		94:2-6; 94:24-95:7	
95:09 – 96:10		97:23-98:7	
98:14 – 19			
99:20 – 100:16			

TAMMY HAMZEHPUR October 18, 2013 Deposition Transcript		
UMB and Ad Hoc Group's Designations	Debtors' and Committee's Objections	Debtors' and Committee's Counter-Designations
14:5-25	14:12-16: objection to form; vague and ambiguous 14:17-25: lack of personal knowledge (FRE 602); lack of foundation (FRE 602, 901, 903)	
15:12-17:21	15:23-16:12: lack of personal knowledge (FRE 602); lack of foundation (FRE 602, 901, 903) 17:3-11: lack of personal knowledge (FRE 602)	
18:8-19:5		
20:18-25:23	Lack of personal knowledge (FRE 602)	25:24-26:16
28:3-21	28:12-21: lack of personal knowledge (FRE 602).	27:12-28:2

TAMMY HAMZEHPUR October 18, 2013 Deposition Transcript		
UMB and Ad Hoc Group's Designations	Debtors' and Committee's Objections	Debtors' and Committee's Counter-Designations
29:21-34:11	31:3-16: objection to form; vague and ambiguous 31:20-25: lack of personal knowledge (FRE 602); objection to form; vague and ambiguous 32:2-10: lack of personal knowledge (FRE 602) 33:11-18: lack of personal knowledge (FRE 602); unduly prejudicial (FRE 403)	
35:11-37:20	35:11-36:3: lack of personal knowledge (FRE 602)	
038:06 – 038:13		
38:19-39:9	Irrelevant (FRE 401, 402)	

SUSHEEL KIRPALANI November 14, 2013 Deposition Transcript			
UMB and Ad Hoc Group Designations	Debtors' and Committee's Objections	Debtors' and Committee's Counter-Designations	UMB and Ad Hoc Group Objections to Counter-Designations
9:3 – 5		9:6-19	
9:20 – 23			
11:21 – 12:4	Lack of personal knowledge/speculative (FRE 602)	12:5-6	
13:22 – 14:15		14:15-15:8; 16:12-17	

LEWIS KRUGER October 30, 2013 Deposition Transcript			
UMB and Ad Hoc Group's Designations	Debtors' and Committees' Objections	Debtors' and Committees' Objections Counter-Designations	UMB and Ad Hoc Group's Objections to Counter-Designations
17:17-20			
18:13-22:12		22:13-23:16	
23:17-24:13		24:14-25:10	
25:11-18		25:19-26:4	
28:17-24		27:21-28:16, 28:25-29:15	
29:19-33:12			
34:2-36:21			
37:8-43:19	42:13-43:2: Objection to form; misleading; confusing.		
45:17-46:3		45:5-16	
47:5-48:15			
49:2-51:13		51:14-52:2	
52:18-55:7	52:18-53:4: Lack of personal knowledge/speculative (FRE 602). 54:5-18: Lack of personal knowledge/speculative (FRE 602).	55:8-25	
56:2-23		56:24-25	
57:2-62:15	57:2-14: Inadmissible hearsay and double hearsay (FRE 802), irrelevant (FRE 401, 402), unduly prejudicial (FRE 403), lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), incomplete (FRE 106). 58:13 - 17: Irrelevant (FRE 401, 402)		

LEWIS KRUGER October 30, 2013 Deposition Transcript			
UMB and Ad Hoc Group's Designations	Debtors' and Committees' Objections	Debtors' and Committees' Objections Counter-Designations	UMB and Ad Hoc Group's Objections to Counter-Designations
64:4-71:23	67:16-68:8: Lack of personal knowledge (FRE 602). 69:8-71:4: Inadmissible hearsay (FRE 802).	62:16-64:3, 71:24-72:8	
78:4-84:18	82:14-16: Objection to form; misleading; confusing; unduly prejudicial.	84:19-21, 85:2-19	
89:9-90:5			
95:5-98:6	96:18-97:5: Lack of personal knowledge/speculative (FRE 602).	98:7-13	
98:14-20			
100:2-19			
101:18-102:5		102:6-14	
103:17-104:9		103:6-16	
105:12-106:7		104:10-105:11, 106:8-107:15	
108:6-23			
112:15-113:25			
114:17-115:5		114:2-16	
116:13-117:18		117:19-119:20	
119:21-121:13			
123:11-125:13			
125:23-126:20			
128:8-11		128:12-19, 128:24-129:11	

LEWIS KRUGER October 30, 2013 Deposition Transcript			
UMB and Ad Hoc Group's Designations	Debtors' and Committees' Objections	Debtors' and Committees' Objections Counter-Designations	UMB and Ad Hoc Group's Objections to Counter-Designations
130:5-23			
132:4-7			
133:6-12		132:16-133:5, 133:13-19, 134:11-136:2	
139:24-141:25			
147:17-148:11			
150:25-151:13			
151:23-152:6		151:14-22	
153:7-154:8			

TOM MARANO November 11, 2013 Deposition Transcript			
UMB and Ad Hoc Group Designations	Debtors' and Committees' Objections	Debtors' and Committees' Counter-Designations	UMB and Ad Hoc Group Objections to Counter-Designations
10:7-11:16			
12:19-13:23	<u>12:19-22:</u> Inadmissible hearsay (FRE 802) <u>13:15-23:</u> Irrelevant (FRE 401, 402), lack of personal knowledge (FRE 602)		
14:18-24	Lack of personal knowledge (FRE 602)		

TOM MARANO November 11, 2013 Deposition Transcript			
UMB and Ad Hoc Group Designations	Debtors' and Committees' Objections	Debtors' and Committees' Counter-Designations	UMB and Ad Hoc Group Objections to Counter-Designations
16:15-17:8	Lack of personal knowledge (FRE 602)		
48:5-8	Inadmissible hearsay (FRE 802), lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903)		
49:19-51:14	Lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), inadmissible lay opinion 51:9-14: objection to form; vague and ambiguous	51:15-53:9	
57:13-60:15	Inadmissible hearsay (FRE 802), lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), inadmissible lay opinion		
62:10-63:12	Irrelevant (FRE 401, 402)		
64:16-65:5			
66:3-9			
69:24-71:13	Irrelevant (FRE 401, 402)	71:14-20	
76:12-77:16		77:17-78:14	

TOM MARANO November 11, 2013 Deposition Transcript			
UMB and Ad Hoc Group Designations	Debtors' and Committees' Objections	Debtors' and Committees' Counter-Designations	UMB and Ad Hoc Group Objections to Counter-Designations
82:10-23			
84:6-19	Lack of personal knowledge (FRE 602)		
85:21-86:6		86:7-17	
87:13-89:7			
97:12-101:19	<u>97:12-99:7:</u> Inadmissible hearsay (FRE 802), lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903) <u>99:8-100:17:</u> lack of personal knowledge (FRE 602), inadmissible lay opinion		
102:3-104:4	<u>102:3-103:20:</u> Inadmissible hearsay (FRE 802), lack of personal knowledge (FRE 602), inadmissible lay opinion, irrelevant (FRE 401, 402)		

WILLIAM MARX October 18, 2013 Deposition Transcript			
UMB and Ad Hoc Group's Designations	Debtors' and Committee's Objections	Debtors' and Committee's Counter-Designations	UMB and Ad Hoc Group's Objections to Counter-Designations
9:2-16			
10:13-11:11			
13:24 – 014:12			
14:22-15:8			
17:3-18:2	Irrelevant (FRE 401, 402)		
20:21 – 021:06	Inadmissible hearsay and double hearsay (FRE 802), irrelevant (FRE 401, 402), lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), incomplete (FRE 106)		
21:22-23:9	Inadmissible hearsay and double hearsay (FRE 802), irrelevant (FRE 401, 402), lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), incomplete (FRE 106)	23:10-24:9	
24:10 – 21			
24:22-25:10			
25:11-24			
28:7-28:14			
28:15-30:2			
30:3-17	Irrelevant (FRE 401, 402), lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903),		
30:18-22			
30:23-31:4			

WILLIAM MARX October 18, 2013 Deposition Transcript			
UMB and Ad Hoc Group's Designations	Debtors' and Committee's Objections	Debtors' and Committee's Counter-Designations	UMB and Ad Hoc Group's Objections to Counter-Designations
31:5-9	Irrelevant (FRE 401, 402), unduly prejudicial (FRE 403)		
31:10-11			
32:2-12	Irrelevant (FRE 401, 402)		
32:23-34:8			
34:9-21	Irrelevant (FRE 401, 402), confusing (FRE 403), lack of personal knowledge (FRE 602)		
34:22-36:23	Irrelevant (FRE 401, 402), unduly prejudicial (FRE 403)	36:24-37:6	
37:7-12	Irrelevant (FRE 401, 402), confusing (FRE 403), lack of personal knowledge (FRE 602)	36:24-37:6	
40:18-41:15	Inadmissible hearsay and double hearsay (FRE 802), irrelevant (FRE 401, 402), unduly prejudicial (FRE 403), lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), incomplete (FRE 106)		
41:16-19	Inadmissible hearsay and double hearsay (FRE 802), irrelevant (FRE 401, 402), unduly prejudicial (FRE 403), lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), incomplete (FRE 106)		

WILLIAM MARX October 18, 2013 Deposition Transcript			
UMB and Ad Hoc Group's Designations	Debtors' and Committee's Objections	Debtors' and Committee's Counter-Designations	UMB and Ad Hoc Group's Objections to Counter-Designations
41:20-42:15	Inadmissible hearsay and double hearsay (FRE 802), irrelevant (FRE 401, 402), unduly prejudicial (FRE 403), lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), incomplete (FRE 106)		
42:16-43:16			
44:2-13			
44:14-45:25			
46:2-47:4	Irrelevant (FRE 401, 402)		
49:24-50:20	Inadmissible hearsay and double hearsay (FRE 802), irrelevant (FRE 401, 402), unduly prejudicial (FRE 403), lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), incomplete (FRE 106)		
50:21-52:11			
52:12-16			
52:17-54:2			
54:3-4	Incomplete (FRE 106), lack of personal knowledge (FRE 602), confusing (FRE 403)		
54:5-12	Irrelevant (FRE 401, 402), unduly prejudicial (FRE 403), calls for legal conclusion (FRE 701, 702, 703), lack of personal knowledge (FRE 602)		

WILLIAM MARX October 18, 2013 Deposition Transcript			
UMB and Ad Hoc Group's Designations	Debtors' and Committee's Objections	Debtors' and Committee's Counter-Designations	UMB and Ad Hoc Group's Objections to Counter-Designations
54:13-20	Irrelevant (FRE 401, 402), unduly prejudicial (FRE 403), calls for legal conclusion (FRE 701, 702, 703)		
54:21-55:8	Irrelevant (FRE 401, 402), unduly prejudicial (FRE 403), lack of personal knowledge/speculative (FRE 602)		
55:9-56:4	Irrelevant (FRE 401, 402), unduly prejudicial (FRE 403), lack of personal knowledge/speculative (FRE 602)		
56:5-23			
58:7-61:3	Inadmissible hearsay and double hearsay (FRE 802), irrelevant (FRE 401, 402), unduly prejudicial (FRE 403), lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), incomplete (FRE 106)	23:10-24:9	
61:4-61:17	Inadmissible hearsay and double hearsay (FRE 802), irrelevant (FRE 401, 402), unduly prejudicial (FRE 403), lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), incomplete (FRE 106)	23:10-24:9	
62:08 – 063:06	Incomplete (FRE 106)		
63:7-64:7			
64:17-24			

WILLIAM MARX October 18, 2013 Deposition Transcript			
UMB and Ad Hoc Group's Designations	Debtors' and Committee's Objections	Debtors' and Committee's Counter-Designations	UMB and Ad Hoc Group's Objections to Counter-Designations
66:6-67:14	Inadmissible hearsay and double hearsay (FRE 802), irrelevant (FRE 401, 402), unduly prejudicial (FRE 403), lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), incomplete (FRE 106), calls for legal conclusion (FRE 701, 702, 703)		
67:25-68:13	Irrelevant (FRE 401, 402)		
68:14-72:3	Objection to Page 68, Line 14 through Page 70, Line 16: Inadmissible hearsay and double hearsay (FRE 802), irrelevant (FRE 401, 402), unduly prejudicial (FRE 403), lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), incomplete (FRE 106)	72:4-14	
73:11-24	Incomplete (FRE 106)		
75:5-12	Incomplete (FRE 106)		
76:12-77:22	Inadmissible hearsay and double hearsay (FRE 802), irrelevant (FRE 401, 402), unduly prejudicial (FRE 403), lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), incomplete (FRE 106)	23:10-24:9	
82:2-83:17	Irrelevant (FRE 401, 402), unduly prejudicial (FRE 403)		

WILLIAM MARX October 18, 2013 Deposition Transcript			
UMB and Ad Hoc Group's Designations	Debtors' and Committee's Objections	Debtors' and Committee's Counter-Designations	UMB and Ad Hoc Group's Objections to Counter-Designations
83:24-84:19	Inadmissible hearsay and double hearsay (FRE 802), irrelevant (FRE 401, 402), unduly prejudicial (FRE 403), lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), incomplete (FRE 106)		
86:15-87:6	Inadmissible hearsay and double hearsay (FRE 802), irrelevant (FRE 401, 402), unduly prejudicial (FRE 403), lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), incomplete (FRE 106)		
88:3-9	Incomplete (FRE 106)	88:10-24	
89:14-90:3			
93:9-95:13	Inadmissible hearsay and double hearsay (FRE 802), irrelevant (FRE 401, 402), unduly prejudicial (FRE 403), lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), incomplete (FRE 106)	92:19-93:8 95:14-96:23 23:10-24:9	

WILLIAM MARX October 18, 2013 Deposition Transcript		
Debtors' and Committee's Designations	UMB and Ad Hoc Group Objections	UMB and Ad Hoc Group Counter-Designations

WILLIAM MARX October 18, 2013 Deposition Transcript		
Debtors' and Committee's Designations	UMB and Ad Hoc Group Objections	UMB and Ad Hoc Group Counter-Designations
6:12-15		
8:24-9:8		
9:17-11:11		
24:10-25:17		
27:7-28:14	27:25-28:6: FRE 402 (Not relevant) FRE 602, 701, 702 (Lacks foundation, calls for expert opinion)	
30:18-31:4		
37:13-25		
44:11-16		
44:19-22		
50:24-52:16		
56:5-58:6		
63:15-64:16		
64:22-65:9		
65:18-66:3		65:10-17
70:17-71:14		66:4-5
72:15-76:5		
78:2-6	FRE 402 (Not relevant)	
79:24-81:17	79:24-81:17 FRE 402 (Not relevant) 80:16-81:17 FRE 602 (Lacks personal knowledge; calls for speculation)	

WILLIAM MARX October 18, 2013 Deposition Transcript		
Debtors' and Committee's Designations	UMB and Ad Hoc Group Objections	UMB and Ad Hoc Group Counter-Designations
84:20-85:12	84:25-85:9 FRE 802 (Hearsay) FRE 1002 (Best evidence)	
88:3-14	88:10-14 FRE 402 (Not relevant)	
88:18-22	88:18-22 FRE 402 (Not relevant) FRE 602, 701, 702 (Lacks foundation, calls for expert opinion)	
90:21-91:25	FRE 602 (Lacks personal knowledge; calls for speculation)	
98:6-11		
98:14-19		

MICHAEL PINZON September 3, 2013 Deposition Transcript		
Wells Fargo's Designations	Debtor's and Committee's Objections	Debtor's and Committee's Counter-Designations
7:8-10		
11:8-12:13		
13:2-17:23		

MICHAEL PINZON September 3, 2013 Deposition Transcript		
Wells Fargo's Designations	Debtor's and Committee's Objections	Debtor's and Committee's Counter-Designations
23:8-14		
38:17-39:20		
58:7-66:5		
68:11-18		
69:9-20		
70:3-16		
71:12-79:8		
80:6-83:5		
83:11-84:17		
85:5-9		
85:25-86:10		
88:10-89:24		
92:8-94:8		
95:9-13		
95:25-99:19		
100:3-103:12		
103:22-104:1		
114:3-115:8		
115:21-116:16		
117:2-124:25		
125:9-127:10		
127:14-128:3		
128:6-10		
128:17-134:19		
135:3-16		
137:19-138:14		
138:21-139:4		

MICHAEL PINZON September 3, 2013 Deposition Transcript		
Wells Fargo's Designations	Debtor's and Committee's Objections	Debtor's and Committee's Counter-Designations
139:7-19		
140:9-146:9		
147:6-148:19		
148:23-149:5		
149:18-150:10		
151:5-152:22		
157:11-159:3		
159:12-160:9		
160:19-161:3		
161:17-163:7		
163:20-25		
164:15-165:6		
165:22-166:18		
167:16-168:13		
169:22-170:123		
171:7-11		
171:18-172:16		
173:2-174:5		
175:4-11		
177:2-25		

MARK RENZI November 6, 2013 Deposition Transcript
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UMB and Ad Hoc Group Designations	Debtors' and Committees' Objections	Debtors' and Committees' Counter-Designations	UMB and Ad Hoc Group Objections to Counter-Designations
12:24-13:20	Irrelevant (FRE 401, 402); incomplete	12:15-23	
148:5-151:19	Irrelevant (FRE 401, 402); incomplete (FRE 106)		
152:16-23	Irrelevant (FRE 401, 402); unduly prejudicial (FRE 403)		
153:9-23	Irrelevant (FRE 401, 402); lack of personal knowledge (FRE 602); incomplete (FRE 106)	153:24-25	
155:6-25	Irrelevant (FRE 401, 402); incomplete (FRE 106)	156:8-157:4	Impermissible lay opinion (FRE 701, 702)
157:5-158:4	Irrelevant (FRE 401, 402); incomplete (FRE 106)		
158:19-159:2	Irrelevant (FRE 401, 402); incomplete (FRE 106)	159:3-19	
167:9-15	Incomplete (FRE 106); lack of personal knowledge (FRE 602)	166:18-167:8	
168:5-11	Irrelevant (FRE 401, 402); lack of personal knowledge (FRE 602); lack of foundation (FRE 602, 901, 903); incomplete (FRE 106)	168:12-20	FRE 611(a) (Non-responsive)
169:5-170:7	Irrelevant (FRE 401, 402); lack of personal knowledge (FRE 602); lack of foundation (FRE 602, 901, 903)		
170:13-171:9	Incomplete (FRE 106)	170:3-12	Hearsay (FRE 802)
181:24-182:6	Incomplete (FRE 106)	181:4-23	

MARK RENZI November 6, 2013 Deposition Transcript			
UMB and Ad Hoc Group Designations	Debtors' and Committees' Objections	Debtors' and Committees' Counter-Designations	UMB and Ad Hoc Group Objections to Counter-Designations
182:20-184:3	Irrelevant (FRE 401, 402); lack of personal knowledge (FRE 602); lack of foundation (FRE 602, 901, 903); incomplete (FRE 106)	184:4-23	
186:6-187:11	Irrelevant (FRE 401, 402); lack of personal knowledge (FRE 602); incomplete (FRE 106)	185:19-186:5	

REID SNELLENBARGER November 8, 2013 Deposition Transcript			
UMB and Ad Hoc Group Designations	Debtors' and Committee's Objections	Debtors' and Committee's Counter-Designations	UMB and Ad Hoc Group Objections to Counter-Designations
224:5-226:2			
296:5-24		289:7-12 290:14 - 291: 6 295:6 - 296:4	
352:12-353:2		352:5-11 353:3-354:13	
355:4-12			
391:24-395:6		395:14-398:21	397:14-398:7 FRE 611(c) (Leading)

REID SNELLENBARGER

November 8, 2013 Deposition Transcript		
Wells Fargo's Designations	UMB and Ad Hoc Group Objections	UMB and Ad Hoc Group Counter-Designations
362:2-365:5	362:2 – 391:18 FRE 601, 611 (Outside the scope of 30(b)(6) topics)	
367:12-389:11	367:15-16 FRE 611(a) (Vague and ambiguous) 368:23-369:4 FRE 611(a) (Vague and ambiguous) 369:21-370:2 FRE 402 (Not relevant) 373:2-379:25 FRE 402 (Not relevant)	389:12-395:6

REID SNELLENBARGER			
November 8, 2013 Deposition Transcript			
Debtors' and Committee's Designations	UMB and Ad Hoc Group Objections	UMB and Ad Hoc Group Counter-Designations	Debtors' and Committee's Objections to Counter-Designations
132:25-133:3			
136:21-145:14			
147:17-149:25			
151:7-155:5	152:18-153:8 FRE 611(a) (Vague and ambiguous)		
155:14-159:11			
160:11-165:5		165:6–166:18	
166:19-168:24			
169:3-172:8			

REID SNELLENBARGER November 8, 2013 Deposition Transcript			
Debtors' and Committee's Designations	UMB and Ad Hoc Group Objections	UMB and Ad Hoc Group Counter- Designations	Debtors' and Committee's Objections to Counter-Designations
174:21-179:17			
180:2-7			
181:22-183:25		184:2-186:18	Beyond the scope of affirmative testimony
188:12-190:10		187:6-18	Beyond the scope of affirmative testimony
190:16-193:25	193:15-194:3 FRE 602 (Lack of foundation)	194:2-3 195:13-197:3	Beyond the scope of affirmative testimony (195:13-197:3)
200:13-202:3		198:15 – 200:3	Beyond the scope of affirmative testimony
202:22-210:6			
210:12-214:19		214:24-216:11	
216:12-224:4		224:5-226:2	
226:8-229:9			
236:14-240:22		234:7-235:24 240:23-242:22	
242:23-246:7			
248:2-11			
248:16-257:14	255:4-6 FRE 602 (Calls for speculation)		
258:8-267:16	258:8-259:2 FRE 611(a) (Vague and ambiguous, misstates witness's testimony)	269:21 – 270:6 270:15 – 25 274:21 – 275:13	Beyond the scope of affirmative testimony; incomplete (FRE 106)
278:16-287:13	279:13-23 FRE 611(a) (Vague and ambiguous)	296:5 – 24 308:23 – 310:7 317:13 – 318:13	

REID SNELLENBARGER November 8, 2013 Deposition Transcript			
Debtors' and Committee's Designations	UMB and Ad Hoc Group Objections	UMB and Ad Hoc Group Counter-Designations	Debtors' and Committee's Objections to Counter-Designations
349:3-8			
349:14-351:5		351:6-353:2	
354:14-355:12	354:14 FRE 611(a) (Vague and ambiguous)	353:3-354:13	

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UMB and Ad Hoc Group's Designations	Debtors' and Committee's Objections	Debtors' and Committee's Counter-Designations
11:18-14:22		
15:13-18		
21:5-20	21:8-15: objection to form; vague and ambiguous	
22:8-23:13		
24:24-26:8	Incomplete (FRE 106)	26:9-27:10
27:11-28:5		
28:9-14	Incomplete (FRE 106)	
35:17-36:7	Lack of foundation (FRE 602, 901, 903); incomplete (FRE 106)	
37:12-42:7	38:18-22: objection to form; vague and ambiguous. 39:24-40:7, lack of personal knowledge (FRE 602); impermissible lay opinion	
43:9-22	Incomplete (FRE 106)	42:24-43:8
44:15-46:5		

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UMB and Ad Hoc Group's Designations	Debtors' and Committee's Objections	Debtors' and Committee's Counter-Designations
46:14-47:24		56:25-58:2
61:20-62:10		
70:4-23	Lack of foundation (FRE 602, 901, 903); incomplete (FRE 106)	70:24-25
75:2-80:6	Lack of personal knowledge (FRE 620); lack of foundation (FRE 602, 901, 903)	
83:16-24	Incomplete (FRE 106)	83:2-15
86:4-87:23		
89:8-25		
90:6-20		
97:3-10	Lack of foundation (FRE 602, 901, 903)	
98:19-99:10	99:6-10: lack of personal knowledge (FRE 602)	99:11-24
99:25-100:20	99:25-100:8: lack of personal knowledge (FRE 602)	
103:4-104:25	104:19-25: Lack of foundation (FRE 602, 901, 903)	
106:23-107:8		
110:6-112:2		112:3-6
112:7-113:12	112:7-15: lack of personal knowledge (FRE 602)	
114:4-123:8	117:3-16: objection to form; vague and ambiguous; lack of personal knowledge (FRE 602) 119:2-11: lack of personal knowledge (FRE 602) 119:12-24, lack of personal knowledge (FRE 602)	

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UMB and Ad Hoc Group's Designations	Debtors' and Committee's Objections	Debtors' and Committee's Counter-Designations
129:15-21	Lack of foundation (FRE 602, 901, 903)	
130:10-131:17	130:10-131:4: objection to form; compound; vague and ambiguous	
134:21-135:16	135:10-16: hearsay (FRE 802), lack of personal knowledge (FRE 602), irrelevant (FRE 401, 402)	
139:24-140:9	Lack of personal knowledge (FRE 602)	
140:23-141:22		
143:2-7		
143:12-144:3	Lack of foundation (FRE 602, 901, 903)	
144:25-145:24	145:19-24: lack of foundation (FRE 602, 901, 903)	
146:15-147:8		
148:11-14		
152:22-157:18		
158:19-159:8		158:10-18
159:13-160:4	Incomplete (FRE 106).	159:9-12 160:5-9
160:19-162:25		
163:5-10		
163:15-25		
164:21-165:23		
166:8-13		
166:21-25		167:2-8
167:22-169:10		

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UMB and Ad Hoc Group's Designations	Debtors' and Committee's Objections	Debtors' and Committee's Counter-Designations
170:20-171:12	170:25-171:12: lack of personal knowledge (FRE 602)	169:17-170:6
171:23-173:10		
174:4-179:12	174:22-175:5, lack of personal knowledge (FRE 602) 177:13-23: objection to form; vague and ambiguous; lack of personal knowledge (FRE 602)	
179:25-180:11		
183:4-190:11	189:25-190:4: lack of personal knowledge (FRE 602), hearsay (FRE 802)	
196:12-197:19	Lack of foundation (FRE 602, 901, 903)	
200:9-16		
205:24-206:10	Incomplete (FRE 106).	206:11-16 228:13-230:2
208:4-22		
214:15-215:22	215:16-22: lack of personal knowledge (FRE 802), hearsay (FRE 802)	
218:16-220:6		220:7-221:16
227:7-23	Incomplete (FRE 106)	

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UMB and Ad Hoc Group Designations	Debtors' and Committee's Objections	Debtors' and Committee's Counter-Designations	UMB and Ad Hoc Group Objections to Counter-Designations
7:12-15			
21:15 – 24:9	Inadmissible hearsay (FRE 802) 21:15-23:3: irrelevant (FRE 401, 402)	17:8-21:14	
26:22-33:5	Inadmissible hearsay and double hearsay (FRE 802), irrelevant (FRE 401, 402), unduly prejudicial (FRE 403), lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), incomplete (FRE 106)	33:6-7	
34:9-36:3	Inadmissible hearsay and double hearsay (FRE 802), irrelevant (FRE 401, 402), unduly prejudicial (FRE 403), lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), incomplete (FRE 106)		
36:20-37:2	Inadmissible hearsay and double hearsay (FRE 802), irrelevant (FRE 401, 402), unduly prejudicial (FRE 403), lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), incomplete (FRE 106)		

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UMB and Ad Hoc Group Designations	Debtors' and Committee's Objections	Debtors' and Committee's Counter- Designations	UMB and Ad Hoc Group Objections to Counter- Designations
37:7-13	Inadmissible hearsay and double hearsay (FRE 802), irrelevant (FRE 401, 402), unduly prejudicial (FRE 403), lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), incomplete (FRE 106)		
38:11-39:17	Inadmissible hearsay and double hearsay (FRE 802), irrelevant (FRE 401, 402), unduly prejudicial (FRE 403), lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), incomplete (FRE 106)		
40:5-18	Inadmissible hearsay (FRE 802)		
45:22-47:16	Inadmissible hearsay (FRE 802)		
48:7-50:12	Inadmissible hearsay (FRE 802)	50:13-25	
51:5-59:19	Inadmissible hearsay (FRE 802), irrelevant (FRE 401, 402)		
61:18-64:19	Inadmissible hearsay (FRE 802), irrelevant (FRE 401, 402)		
66:22-25	Inadmissible hearsay (FRE 802), irrelevant (FRE 401, 402)		

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UMB and Ad Hoc Group Designations	Debtors' and Committee's Objections	Debtors' and Committee's Counter- Designations	UMB and Ad Hoc Group Objections to Counter- Designations
67:6-68:17	Inadmissible hearsay (FRE 802)		
69:3-72:9	Inadmissible hearsay (FRE 802), irrelevant (FRE 401, 402)		
73:13-75:18	Inadmissible hearsay (FRE 802), irrelevant (FRE 401, 402), lack of personal knowledge (FRE 602)		

JAMES YOUNG November 6, 2013 Deposition Transcript			
UMB and Ad Hoc Group Designations	Debtors' and Committee's Objections	Debtors' and Committee's Counter- Designations	UMB and Ad Hoc Group Objections to Counter- Designations
76:5-103:20	Inadmissible hearsay (FRE 802) (except for 94:24-101:21) 76:5-80:9: irrelevant (FRE 401, 402), waste of time (FRE 403) 80:10-88:11: irrelevant (FRE 401, 402), lack of foundation (FRE 602, 901, 903) 88:25-89:5: lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903) 89:6-90:19: lack of personal knowledge (FRE 602), irrelevant (FRE 401, 402), improper lay opinion 91:2-92:10: lack of personal knowledge (FRE 602), irrelevant (FRE 401, 402), improper lay opinion, lack of foundation (FRE 602, 901, 903) 92:21-93:19: lack of personal knowledge (FRE 602) 94:24-101:21: no objection 101:22-103:20: lack of personal knowledge (FRE 602), irrelevant (FRE 401, 402), improper lay opinion		
104:10-106:24			

JAMES YOUNG November 6, 2013 Deposition Transcript			
UMB and Ad Hoc Group Designations	Debtors' and Committee's Objections	Debtors' and Committee's Counter- Designations	UMB and Ad Hoc Group Objections to Counter- Designations
107:6-122:18	Inadmissible hearsay (FRE 802), irrelevant (FRE 401, 402), lack of personal knowledge (FRE 602), improper lay opinion, lack of foundation (FRE 602, 901, 903)		
123:5-128:20	Inadmissible hearsay (FRE 802) 123:5-11: lack of personal knowledge (FRE 602) 126:2-127:4: lack of personal knowledge (FRE 602), improper lay opinion		
130:4-134:23	133:24-134:23: irrelevant (FRE 401, 402)		
135:4-136:25			
137:22-139:2	137:22-138:15: irrelevant (FRE 401, 402)		
139:13-20			
140:5-22			
141:9-149:22			
151:19-24	Lack of personal knowledge (FRE 602)		
153:9-165:15			

<p style="text-align: center;">JAMES YOUNG November 6, 2013 Deposition Transcript</p>			
UMB and Ad Hoc Group Designations	Debtors' and Committee's Objections	Debtors' and Committee's Counter-Designations	UMB and Ad Hoc Group Objections to Counter-Designations
166:25-177:18	<p>166:25-167:8: inadmissible hearsay (FRE 802)</p> <p>169:13-25: inadmissible hearsay (FRE 802), lack of personal knowledge (FRE 602)</p> <p>170:2-16: inadmissible hearsay (FRE 802), lack of personal knowledge (FRE 602)</p> <p>170:17-171:6: lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), inadmissible hearsay (FRE 802)</p> <p>174:16-175:17: lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), inadmissible hearsay (FRE 802)</p> <p>176:13-25: lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), inadmissible hearsay (FRE 802)</p> <p>177:11-18: lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), inadmissible hearsay (FRE 802)</p>		

JAMES YOUNG November 6, 2013 Deposition Transcript			
UMB and Ad Hoc Group Designations	Debtors' and Committee's Objections	Debtors' and Committee's Counter- Designations	UMB and Ad Hoc Group Objections to Counter- Designations
178:12 – 197:12	<p>178:12-181:8: lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), inadmissible hearsay (FRE 802)</p> <p>184:6-185:18: lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), inadmissible hearsay (FRE 802)</p> <p>188:15-189:18: lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), inadmissible hearsay (FRE 802)</p> <p>189:24-190:13: Inadmissible hearsay (FRE 802)</p> <p>190:25-191:8: lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), inadmissible hearsay (FRE 802)</p> <p>192:22-197:12: lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), inadmissible hearsay (FRE 802)</p>		

JAMES YOUNG November 6, 2013 Deposition Transcript			
UMB and Ad Hoc Group Designations	Debtors' and Committee's Objections	Debtors' and Committee's Counter- Designations	UMB and Ad Hoc Group Objections to Counter- Designations
198:10-205:3	198:10-199:25: Inadmissible hearsay (FRE 802) 203:12-204:9: lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), inadmissible hearsay (FRE 802) 204:15-205:3: lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), inadmissible hearsay (FRE 802)		
205:17-210:7	205:17-208:23: Inadmissible hearsay (FRE 802) 208:24-210:7: lack of personal knowledge (FRE 602), lack of foundation (FRE 602, 901, 903), inadmissible hearsay (FRE 802)		

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